

May 31, 2011

Benton Foundation
1250 Connecticut Ave., NW, Suite 200
Washington, DC 20036

VIA ECFS

Ms. Marlene H. Dortch
Secretary Federal Communications Commission
445-12th Street SW, Room TWB 204
Washington, D.C. 20554

*Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Lifeline and Link Up, WC Docket No. 03-109*

Notice of Ex Parte Presentation

Dear Ms. Dortch:

On May 31st, 2011 Amina Fazlullah Policy Counsel for the Benton Foundation spoke with Jamie Susskind, Jonathan Lechter, Cindy Spiers, and Graham Dufault of the Wireline Competition Bureau (WCB) to discuss changes to the administration of the Lifeline and Link Up programs. Following the filing of Benton's comments in the Lifeline and Link Up Reform and Modernization and Lifeline and Link Up dockets WCB reached out to Benton to follow up on the issue of the "one per residence" rule.

The discussion focused on the following points:

- The need for the "one per residence" rule to be changed to accommodate group living situations. Benton suggested that the FCC clarify the rule so that it reads and is implemented as "one per eligible adult".
- Benton stressed that this clarification would be achieve the program's stated purpose to provide low-income or no income individuals with access to communications services.
- Benton noted that with the clarification to "one per eligible adult" the program would likely need to expand their wireless offerings. This expansion would require a restructuring of the rules surrounding wireless Lifeline and Link Up services to ensure that participants receive adequate services and that the verification procedure is adequately rigorous.
- Benton then discussed the need for the FCC to reach out to other agencies that are managing social assistance programs and suggested and intergovernmental dialogue with HHS and HUD.
- Benton also discussed the need for the FCC to reach out at the community provider level. Benton suggested setting up meetings or a series of roundtables

- with volunteer legal services programs, homeless advocacy projects, women's shelters, prison reintegration projects and assisted living facilities.
- Benton also noted that the clarification of the "one per eligible adult" rule would require a verification management system that is a robust and secure database.

Please contact the undersigned if there are any questions.

Sincerely,

/s/

Amina Fazlullah
Policy Counsel
Benton Foundation

cc: Jamie Susskind